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August 4, 1996

Lester Snow, Executive Director   Fax (916) 654-9780
CALFED Bay-Delta Program
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Dear Lester:

I propose that the agenda for the next BDAC meeting include
deliberation by BDAC regarding several proposals that are
included in the June 25 and July 19 packets. These are proposals
regarding which some BDAC members have expressed concern, but
which remain among the alternatives without resolution of the
concerns.

1)   The June 25 and July 19 packets, each on page 36, propose
reducing agricultural water "demand" by substantial permanent and
temporary fallowing of agricultural land "to make water available
for other uses." You have since backed away from permanent
fallowing, but not from the proposal to "maximize the potential
for temporary land fallowing." The BDAC should discuss and
advise as to whether this is in the public interest.

Why should the agricultural industry be the only water
dependent industry to give up dry year water and how does the
proposal comply with the solution principles of providing a
"reasonable balance of reliability", and "avoiding redirected
impacts", and minimizing "economic impacts at the regional
level?"

Periodic shut down of any industry involves unemployment,
local economic impacts, loss of cash flow to service debt (except
for the willing sellers), loss of customers, and loss of service
businesses who cannot survive the shutdown, such as parts and
equipment suppliers, contract services, food processors, etc.

2)   To what extent should we foster reallocation of water by
transfers and what type of transfers? Transfers among
agricultural water users is a long established and desirable
practice. Why don't we also encourage transfers among urban
water users, including municipal industries and individual
residential water users, just as we do among farmers? What are
the social implications of encouraging transfers of water to a
different basin and purpose of use whenever a willing seller
benefits regardless of impacts on local employment, downstream
water users, etc.? (Note the Herrick-Hildebrand critique of the
proposed "Model Water Transfer Act" which we previously sent to
you).

3) The program talks of seeking durability, e.g., page 3 of Objectives in the June 25 packet. What California population are we planning for, and what water supply will be needed to meet that population's needs for residences, jobs, manufactured goods and food? Durability will not be achieved if those needs are not met.

4) How can we ignore the economic and social consequences of failing to provide a drain to restore the salt balance in the south Central Valley? That salt balance was destroyed by the importation of a very substantial salt load via the Delta Mendota Canal.

5) How do we reconcile the proposal throughout the program for substantial "purchase of water on the San Joaquin River system", (e.g., page 29, June 25) with the principle of avoiding "redirected impacts"? Why do we not propose to supply this water either by developing new yield or by purchases from users of DMC water instead of from water short tributaries. Reallocation of agricultural water on the tributaries not only depletes agriculture on the tributaries, it also reduces downstream summer streamflow needed for water quality, for riparian diversions, for resdient fishery, and for consumptive public trust purposes.

6) If we propose substantial conversions of agricultural land to wetlands shouldn't the proposals include development of new water yield to replace the water supply lost to non-environmental purposes? An acre of wetland consumes substantially more water than an acre of farmed land.

These questions and issues are matters of policy which I believe should be addressed now and not buried in the PEIS process. The PEIS is not a policy document. I hope your will agree.

Sincerely,

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